

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

THOMAS CALLEN; COURTNEY CALLEN;  
and GOLDEN POLAR BEAR, LLC,

Plaintiff,

vs.

ILKB LLC; MICHAEL PARRELLA; RYAN  
HEALY; and SCOTT FERRARI, each  
individually; and ILKB TOO, LLC; DANIEL  
CASTELLINI; and SHAUN YORK, each as  
successor by merger to ILKB LLC,

Defendant.

Case No.: 2:20-cv-03345-DRH-ST

**DEFENDANT ILKB LLC'S NOTICE  
OF MOTION TO DISMISS**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant ILKB LLC respectfully move this Court to enter an order dismissing Plaintiffs' claims based on their failure to state a claim.

**PLEASE TAKE FURTHER NOTICE** that in support of the instant motion, Defendant shall rely upon the accompanying Memorandum of Law and all other pleadings and proceedings had herein; and

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

Dated: August 20, 2020

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Peter G. Siachos, Esq.  
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